

William J. Castillo (WC-6786)
CAESAR, RIVISE, BERNSTEIN,
COHEN & POKOTILOW, LTD.
1635 Market Street, 11th Floor
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Telephone: (215) 567-2010
Facsimile: (215) 751-1142

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STEVEN MICHAEL HARRIS,

Plaintiff,

v.

**SIMON & SCHUSTER, INC., and
THE MCGRAW-HILL COMPANIES, INC.**

Defendants.

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**Civil Action No.
1:08-CV-3477-RWS**

**NOTICE OF MOTION AND MOTION TO ADMIT
COUNSEL PRO HAC VICE**

PLEASE TAKE NOTICE THAT, upon the annexed Affidavit of William J. Castillo, Esq., sworn to on May 8, 2008, and upon all prior filings and proceedings in this Action and, further, pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, Plaintiff Steven Michael Harris ("Plaintiff") hereby moves this Court in the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007-1312 on May 28, 2008 or as soon thereafter as counsel can be heard, for an Order to admit attorneys Manny D. Pokotilow and Salvatore R. Guerriero *pro hac vice* to appear, practice and participate as co-counsel in all further proceedings in the above-captioned Action.

FILED
MAY 14 2008
CLERK OF COURT
SOUTHERN DISTRICT OF NEW YORK


650301 \$ 50 5/9/08 2

The undersigned requests this Motion be granted on the papers submitted herewith without oral hearing. A Proposed Order is attached for the Court's convenience.

Respectfully submitted,

Dated: May 8, 2008

By

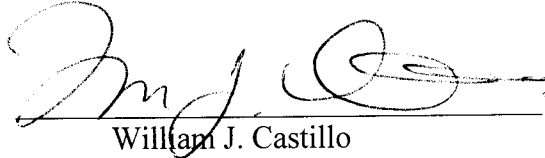


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Email: <WJCastillo@crbcp.com>

CERTIFICATE OF SERVICE

The undersigned hereby certifies that true and correct copies of Plaintiff's Notice of Motion and Motion to Admit Manny D. Pokotilow and Salvatore R. Guerriero *Pro Hac Vice*, the Affidavits of William J. Castillo, Manny D. Pokotilow and Salvatore R. Guerriero in Support thereof and a Proposed Order, were served upon counsel for Defendants, on May 8, 2008, by email and first class mail, postage prepaid , in an envelope addressed to:

Marcia B. Paul
Bryan M. Tallevi
Davis Wright Tremaine, LLP
1633 Broadway, 27th Floor
New York, NY 10019-6708



William J. Castillo

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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STEVEN MICHAEL HARRIS,

Plaintiff,

V.

**SIMON & SCHUSTER, INC., and
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Defendants.

[illegible]

Civil Action No.
1:08-CV-3477-RWS

**AFFIDAVIT OF WILLIAM J. CASTILLO IN SUPPORT
OF MOTION TO ADMIT COUNSEL PRO HAC VICE**

[illegible]

WILLIAM J. CASTILLO, being duly sworn states:

1. I am an attorney admitted to practice before the Courts of the State of New York and the United States District Court for the Southern District of New York. I am in good standing with each of these courts. I am a member of the firm of Caesar, Rivise, Bernstein, Cohen & Pokotilow, Ltd. having offices at 1635 Market Street, Seven Penn Center – 11th Floor, Philadelphia, Pennsylvania 19103-2212, counsel for Plaintiff Steven Michael Harris (“Plaintiff”).

2. I make this Affidavit in support of Plaintiff's Motion for admission *pro hac vice*, pursuant to Local Rule 1.3(c), of Manny D. Pokotilow and Salvatore R. Guerriero, attorneys with

the firm of Caesar, Rivise, Bernstein, Cohen & Pokotilow, Ltd., who seek to act as co-counsel for Plaintiff in this action.

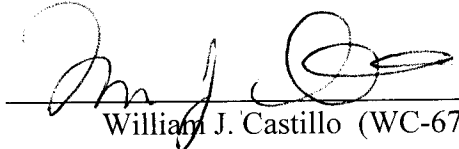
3. I have known both Manny D. Pokotilow and Salvatore R. Guerriero since 1999 and have found each of them to be a skilled attorney and a person of integrity.

4. Manny D. Pokotilow is an attorney in good standing in the State of Pennsylvania as set forth in the Certificate of Good Standing from the Supreme Court of Pennsylvania, which is annexed hereto as Exhibit 1. The certificate also indicates that Manny D. Pokotilow has been admitted to practice since 1964.

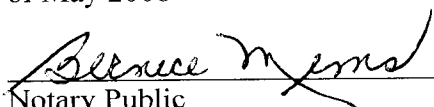

5. Salvatore R. Guerriero is an attorney in good standing in the State of Pennsylvania as set forth in the Certificate of Good Standing from the Supreme Court of Pennsylvania which is annexed hereto as Exhibit 2. The certificate also indicates that Salvatore R. Guerriero has been admitted to practice since 1999.

6. Both Manny D. Pokotilow and Salvatore R. Guerriero have read and are familiar with the local rules of this Court. I am also familiar with the local rules of this Court, and, together with other admitted attorneys from the firm of Caesar, Rivise, Bernstein, Cohen & Pokotilow, Ltd., will be assisting Manny D. Pokotilow and Salvatore R. Guerriero.

7. Accordingly, in light of Local Rule 1.3(c), Plaintiff respectfully requests the Court to admit Manny D. Pokotilow and Salvatore R. Guerriero *pro hac vice* to participate as co-counsel in all further proceedings in the above-captioned matter, including all post trial motions.


William J. Castillo (WC-6786)

Sworn to before me this 8th day
of May 2008


Notary Public




Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Manny Pokotilow, Esq.

DATE OF ADMISSION

November 16, 1964

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: April 18, 2008

Patricia A. Johnson

Patricia A. Johnson
Chief Clerk



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Salvatore R. Guerriero, Esq.

DATE OF ADMISSION

August 30, 1999

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: April 18, 2008

A handwritten signature in black ink, reading "Patricia A. Johnson".

Patricia A. Johnson
Chief Clerk

William J. Castillo (WC-6786)
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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STEVEN MICHAEL HARRIS,

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**Civil Action No.
1:08-CV-3477-RWS**

AFFIDAVIT OF MANNY D. POKOTILOW

STATE OF PENNSYLVANIA)
) ss:
COUNTY OF PHILADELPHIA)

MANNY D. POKOTILOW, being duly sworn states:

1. I am an attorney at law and a shareholder of the law firm of Caesar, Rivise, Bernstein, Cohen & Pokotilow, Ltd., 1635 Market Street, Seven Penn Center – 11th Floor, Philadelphia, Pennsylvania, 19103-2212.

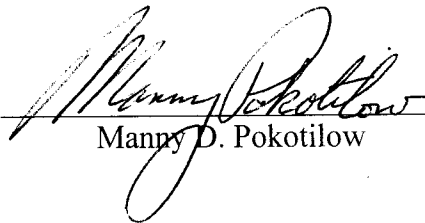
2. I submit this Affidavit in support of the Motion of Plaintiff Steven Michael Harris (“Plaintiff”) to be admitted *pro hac vice* for purposes of this litigation.

3. I am a member in good standing of the Bar of the Courts of Pennsylvania and the District of Columbia, the United States Court of Appeals for the Federal Circuit and the United States Supreme Court.

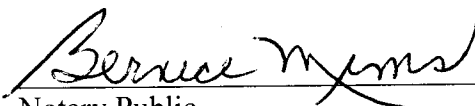
4. I have never been subject to any disciplinary action, suspension from the practice of law or disbarment.

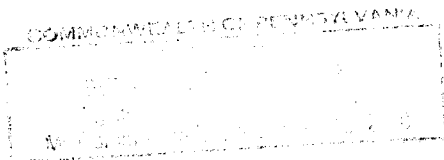
5. I agree that I will abide by the United States District Court Rules and the Rules for the Southern District of New York.

6. I hereby declare that all statements made herein are true, and further that these statements are made with the knowledge that willful false statements and the like are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States code.


Manny D. Pokotilow

Sworn to before me this 8th day
of May 2008


Notary Public



William J. Castillo (WC-6786)
CAESAR, RIVISE, BERNSTEIN,
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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STEVEN MICHAEL HARRIS,

Plaintiff,

Y.

**SIMON & SCHUSTER, INC., and
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Defendants.

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Civil Action No.
1:08-CV-3477-RWS

AFFIDAVIT OF SALVATORE R. GUERRIERO

[illegible]


SALVATORE R. GUERRIERO, being duly sworn states:

1. I am an attorney at law and a member of the law firm of Caesar, Rivise, Bernstein, Cohen & Pokotilow, Ltd., 1635 Market Street, Seven Penn Center – 11th Floor, Philadelphia, Pennsylvania, 19103-2212.
2. I submit this Affidavit in support of the Motion of Plaintiff Steven Michael Harris (“Plaintiff”) to be admitted *pro hac vice* for purposes of this litigation.
3. I am a member in good standing of the Bars of Pennsylvania and New Jersey.

4. I have never been subject to any disciplinary action, suspension from the practice of law or disbarment.

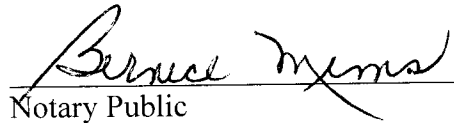
5. I agree that I will abide by the United States District Court Rules and the Rules for the Southern District of New York.

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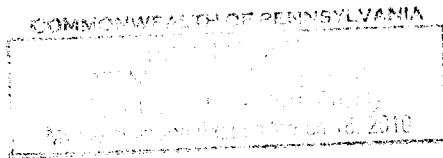


Salvatore R. Guerriero

Sworn to before me this 8th day
of May 2008



Notary Public



William J. Castillo (WC-6786)
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Civil Action No.
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[PROPOSED] ORDER

The Court, having reviewed the Affidavit of William J. Castillo, sworn to on May 8, 2008, and having reviewed the exhibits attached thereto, and the accompanying Motion to Admit Manny D. Pokotilow and Salvatore R. Guerriero of Caesar, Rivise, Bernstein, Cohen & Pokotilow, Ltd., 1635 Market Street, Seven Penn Center – 11th Floor, Philadelphia, Pennsylvania 19103-2212, *pro hac vice*, it is hereby ORDERED that the admission of Manny D. Pokotilow and Salvatore R. Guerriero *pro hac vice* is granted.

Dated: _____, 2008
New York, NY

United States District/Magistrate Judge